

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 4:14CR246 AGF/NAB
v.)	
)	FILED UNDER SEAL
THOMAS GREGORY ANDERSON, JR.,)	
)	
Defendant.)	

**DEFENDANT ANDERSON'S MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE PRETRIAL MOTIONS**

COMES NOW Defendant, Thomas Gregory Anderson, Jr., by and through his attorneys, Capes, Sokol, Goodman & Sarachan, P.C., and in support of his Motion for Extension of Time Within Which to File Pretrial Motions states as follows:

1. That Defendant is charged with one violation each of Title 21, U.S.C. Section 846 and Title 18, U.S.C. Section 1956.
2. That Defendant was arraigned on August 27, 2014.
3. Prior to this motion, Defendant Anderson has been granted nine extensions within which to file pretrial motions.
4. The most recent court order dated September 3, 2015, concerning pretrial motions, granted Defendant's motion and set October 7, 2015 as the deadline within which to file said motions.
5. That on September 26, 2014, U.S. Magistrate Judge Baker entered a complex case finding pursuant to Title 18, U.S.C. Section 3161(h)(7)(A)(B)(i)(ii) (Doc. 157).
6. That on March 27, 2015, the government filed a motion under seal for inquiry into potential conflicts of interest. That on April 8, 2015, counsel for Defendant Thomas Anderson

filed under seal its Motion to Dismiss for Irreparable Denial of Defendant's Constitutional Right to Effective Assistance of Counsel.

7. That on June 23, 2015 and June 24, 2015, a hearing on these motions was held before this Honorable Court. That subsequent to the hearing, both parties filed briefs and further arguments were made before the Court on August 24, 2015. That on September 28, 2015, this Court filed its Report and Recommendation, recommending that Defendant's Motion to Dismiss for Irreparable Denial of Defendant's Constitutional Right to Effective Assistance of Counsel be denied. The Court advised the parties that they have 14 days within which to file written objections to the Report and Recommendation (Document #483).

8. That counsel for the Defendant intends to timely file its objections to the Report and Recommendation.

9. That counsel for the Defendant believes it is in the best interest of judicial economy and efficiency that the deadline for filing pretrial motions be postponed until after the pending motion to dismiss has been fully resolved by the district court.

10. That this motion is not being made for the purposes of unnecessary delay.

11. That counsel for Defendant has discussed this matter with the Court and with Assistant United States Attorney, John Davis, and Mr. Davis has indicated that he has no objection to this motion.

WHEREFORE Defendant prays that this Honorable Court grant his Motion for Extension of Time, enter an order granting the Defendant an additional 45 days within which to file pretrial motions, and for such further orders as the Court deems just and proper.

Respectfully submitted,

Capes, Sokol, Goodman & Sarachan, P.C.

/s/ William S. Margulis
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Certificate of Service

I hereby certify that on October 6, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Office of the United States Attorney.

/s/ William S. Margulis